

# **Exhibit 16**

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*Attorneys for Plaintiff  
Jump Operations, LLC*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

## JUMP OPERATIONS, LLC,

Plaintiff,

V.

RICHARD WRIGHT MERRYMAN,

Defendant.

Case No.: 2:22-cv-00575-GMN-DJA

**DECLARATION OF JAMES M.  
JIMMERSON, ESQ. IN SUPPORT OF  
EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING  
ORDER WITHOUT NOTICE IN  
ANTICIPATION OF FUTURE  
REQUEST FOR PRELIMINARY  
INJUNCTION**

I, James M. Jimmerson, Esq., hereby declare as follows:

1. I am an attorney with The Jimmerson Law Firm, P.C., counsel for Plaintiff Jump Operations, LLC (“Plaintiff”). I am over 18 years of age, and I have personal knowledge of the facts set forth below.

2. This declaration is made in support of Plaintiff's Emergency Motion for Temporary Restraining Order Without Notice in Anticipation of Future Request for Preliminary Injunction (the "Motion").

3. The nature of the emergency currently experience by Plaintiff is the ongoing threat of Defendant's sale, transfer, and/or encumbrance of the domain name

1 [www.wormhole.com](http://www.wormhole.com) (the “Wormhole Domain”). *See* Declaration of Jonathan Marcus at  
2 ¶ 10; Declaration of Jeffrey A. Wakolbinger, Esq. at ¶ 10.

3 4. Plaintiff attempted to resolve this problem without legal action but these  
4 efforts were unsuccessful. *See id.*

5 5. Plaintiff’s attorney’s contact information is as follows:

6 THE JIMMERSON LAW FIRM, P.C.  
7 JAMES M. JIMMERSON, ESQ.  
8 Nevada State Bar No. 12599  
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17 525 W. Monroe St.  
18 Chicago, IL 60661  
19 Telephone: 312.902-5200

20 6. Defendant does not have an attorney that has appeared in this action.  
21 Defendant’s contact information is as follows:

22 Richard Wright Merryman  
23 4800 Westmont Ave.  
24 Pahrump, NV 89061  
25 [dicko@wormhole.com](mailto:dicko@wormhole.com)  
26 Telephone: unknown

27 7. Due to the fear that Mr. Merryman will attempt to defeat any future order  
28 for specific performance before a temporary restraining order could be issued, Plaintiff  
has not contacted Mr. Merryman since the Complaint was filed in this action.

29 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws  
30 of the United States of America that the foregoing is true and correct.

31 Executed April 7, 2022, in Las Vegas, Nevada.

32 /s/ James M. Jimmerson, Esq.  
33 JAMES M. JIMMERSON, ESQ.